

WEIL, GOTSHAL & MANGES LLP
Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
(jkim@kbbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

Bankruptcy Case No. 19-30088 (DM)

PG&E CORPORATION,

Chapter 11

- and -

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC
COMPANY,**

**REORGANIZED DEBTORS' REPORT
ON RESPONSES TO FIFTEENTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (SECURITIES
ACQUIRED OUTSIDE SUBJECT
PERIOD) AND REQUEST FOR ORDER
BY DEFAULT AS TO UNOPPOSED
OBJECTIONS**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

[Re: Dkt. No. 11343]

**Resolving Objections Set for Hearing
November 9, 2021 at 10:00 a.m. (Pacific
Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that
8 the Court enter an order by default on the *Reorganized Debtors’ Fifteenth Securities Claims Omnibus*
9 *Objection (Securities Acquired Outside Subject Period)* [Docket No. 11343] (the “**Fifteenth Securities**
10 **Claims Omnibus Objection**”).

11 **RELIEF REQUESTED IN**

12 **THE FIFTEENTH SECURITIES CLAIMS OMNIBUS OBJECTION**

13 The Fifteenth Securities Claims Omnibus Objection seeks to disallow and expunge proofs of
14 claim that were filed by PG&E security holders who do not purport to have purchased or otherwise
15 acquired PG&E securities during the period April 29, 2015 through November 15, 2018 and who did
16 not file a claim prior to the original bar date of October 21, 2019. These claims are listed in **Exhibit 1**
17 to the Fifteenth Securities Claims Omnibus Objection.

18 **NOTICE AND SERVICE**

19 The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Fifteenth*
20 *Securities Claims Omnibus Objection (Securities Acquired Outside Subject Period)* [Docket No. 11345]
21 (the “**Notice of Hearing**”). The Fifteenth Securities Claims Omnibus Objection was supported by the
22 *Declaration of Edward J. Radetich, Jr. in Support of Reorganized Debtors’ Fifteenth Securities Claims*
23 *Omnibus Objection (Securities Acquired Outside Subject Period)* [Docket No. 11344] (the “**Radetich**
24 **Declaration**”). The Fifteenth Securities Claims Omnibus Objection, the Notice of Hearing, and the
25 Radetich Declaration were served as described in the *Certificate of Service* of Sonia Akter, filed on
26 October 5, 2021 [Docket No. 11376] (the “**Certificate of Service**”). As further described in the
27 Certificate of Service, on September 28, 2021, each holder of a claim listed on **Exhibit 1** to the Fifteenth
28 Securities Claims Omnibus Objection received a notice including the claim number, debtor, claim

amount and priority, and the basis for the Reorganized Debtors' objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Fifteenth Securities Claims Omnibus Objection has passed. The Reorganized Debtors have received the following response:

Docket No.	Claimant	Claim No(s).	Resolution
Informal	Franklin F. Oliveros & Zenaida C. Oliveros	102822	The Reorganized Debtors are working to consensually resolve this informal objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the December 7, 2021, omnibus hearing.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a partner with the law firm of Weil, Gotshal & Manges LLP ("**Weil**"), counsel for the Reorganized Debtors.

2. The Court's docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed with respect to the Fifteenth Securities Claims Omnibus Objection except as described herein.

WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and expunging the proofs of claim listed in the column headed "Claims to be Disallowed/Expunged" in **Exhibit A** to this Request, which listed claims identical to those in **Exhibit 1** to the Fifteenth Securities Claims Omnibus Objection, except as otherwise discussed above.

Dated November 2, 2021

WEIL, GOTSHAL & MANGES LLP

KELLER BENVENUTTI KIM LLP

By: /s/ Richard W. Slack

Richard W. Slack

Attorneys for Debtors and Reorganized Debtors